

**DEPARTMENT OF BENEFIT PAYMENTS**

744 P Street, Sacramento, CA 95814



April 8, 1977

ALL-COUNTY LETTER NO. 77-19 (PROG. REV. &amp; FRAUD PREV.)

TO: ALL COUNTY WELFARE DIRECTORS  
ALL COUNTY DISTRICT ATTORNEYS

SUBJECT: Duplicate Aid Detection System

REFERENCE:

On February 3, 1977 the Department announced that a statewide system was under development which would trigger investigations of welfare cases where duplicate aid may have been paid. In this process, duplicate social security number data were reviewed in a sample county. This review indicated that such a system can be valuable not only in indicating possible duplicate aid payments, but also in aiding counties in identification of erroneous social security numbers in the system. Because of these potential advantages DBP will produce an ongoing report to be periodically released to the counties which would identify cases having the same social security number as a case in a different county. As a beginning DBP has screened cases on aid for the period January - September 1976 and eliminated all but those cases where the available data indicates that dual aid may have potentially been issued. It will be up to the counties to determine if dual aid was actually paid to the recipients through local verification.

A report of these potential dual aid cases will be sent to the counties on April 15, 1977. Furnishing the report is not considered a mandate upon the counties to institute a new program but rather a part of a continuing state effort to assist the counties in their maintenance of the efficiency, effectiveness and equity of their income maintenance systems. The format of the report will include:

1. The social security number of the recipient.
2. The counties shown as reporting concurrent aid paid to a recipient with this social security number.
3. The AFDC case numbers in the respective counties.
4. The name or names used in the respective counties.
5. The months of payment overlap.

As intercounty contacts will be necessary for effective utilization of this report, each county should immediately designate a single person or contact for all communication on the system. The attached form should be returned to the Fraud Prevention Bureau of the Department of Benefit Payments as soon as possible. The names or contact points so reported will be collated at the state level and the complete list will be furnished to the counties. As it is envisaged, the bulk of the verification procedures will fall upon the county SIUs. They are seen as the most logical contact points, although this is not necessarily true in those counties where welfare fraud investigations are conducted by the District Attorney's Office.

Since most counties will choose to utilize this system as both a fraud detection tool and an administrative procedures monitoring device, the following generalized handling instructions are suggested:

1. Overall responsibility for processing the data and the disposition of a case should be assigned to the contact person or unit. Each case should be evaluated for the possibility of fraud investigation under the provisions of section 20-004 of the EAS manual.
2. Each county involved in a potential duplicate aid payment should completely assemble all of the information available in that county before contacting the companion county(s). (Exception: If it is found that no aid was paid by the county for the entire length of the alleged overlap, or aid was paid in error by the county for this entire period, the companion county(s) should be notified immediately in order that unnecessary investigation may be avoided.)
3. If intercounty coordination detects duplicate aid payment to a single case resulting in a collectible overpayment and/or the necessity of case referral for possible fraud prosecution a "lead" county must be designated to effect **the ultimate disposition of the case**. The decision to designate the "lead" county will normally be based upon facts surrounding each case and with the consultation and concurrence of appropriate DA office(s). Factors for consideration in determining the "lead" county are the following: present county of recipient residence, positive determination of overpayment in a given county, etc. Once this determination has been made, all of the companion county's information should be placed in an investigative report format and dispatched expeditiously to the lead county for the final disposition of the investigation. If more than two counties are involved in the case, the "lead county" decision must take into account the interests of all counties concerned. If more than one county is considering prosecution, each prosecuting county will require copies of the investigative reports of all other counties involved in the case.

The Department of Benefit Payments, through the Fraud Prevention Bureau, will assess the impact, benefits and end results of this system. The counties should account for their efforts and findings using the format attached. Beginning at the end of May 1977 and periodically thereafter, personnel of FPB will contact the individual counties and retrieve this information. It will not be necessary to forward these reports to the state, but they should be

retained as county records.

Questions or coordination matters regarding this letter or subsequent communications on the system should be addressed to:

Fraud Prevention Bureau  
744 P Street, M.S. 19-19  
Sacramento, CA 95814

Attention: Ellis C. Graham  
(916) 322-2296

Sincerely,

A handwritten signature in black ink that reads "Kyle S. McKinsey". The signature is written in a cursive, flowing style with a large, stylized "K" and "M".

KYLE S. McKINSEY  
Deputy Director

Attachment

DUPLICATE AID DETECTION SYSTEM

\_\_\_\_\_  
Date

To: Fraud Prevention Bureau  
Dept. of Benefit Payments  
744 P Street  
Sacramento, CA 95814

Attn: Ellis C. Graham

Contact point or person for coordination of this system

in \_\_\_\_\_ county is \_\_\_\_\_,  
name

\_\_\_\_\_, whose work telephone number  
title

is ( ) \_\_\_\_\_ and whose mail address is:  
area code number

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signed \_\_\_\_\_

Title \_\_\_\_\_

## Instructions for Statistical Accumulation

1. Statistical accumulation should start with the date the report is received. Reports should be compiled on a monthly basis, except that the first report should cover the period from the date the data is received to May 31. All other reports should cover the period from the first of the month to the last day of that month.
2. Section A through C cover investigative activity. This section should be completed by the investigating unit whether it is located in the County Welfare Department, the District Attorney's office or some other county agency. All cases on the report should be considered as pending investigation until a disposition is made in Section B. Thus, the initial report will list under Section A-1 the total number of cases on the county printout. Succeeding months entries in Section A-1 will be taken from item C in the previous month's report.
3. Section B, dispositions, will reflect only those cases on which investigative activity has been completed.

B-1 will show those cases where it has been determined that no duplicate aid was paid, and no county errors exist. If investigative activity discloses no duplicate aid, but elements of some other type of fraud or other criminal violation (perjury, conspiracy, etc) the case will be entered in this item, then picked up as a case accepted for investigation in the county's DPA 266.1 report and this fact noted in the remarks section on this report.

B-2 will indicate these cases where inter-county coordination has determined that there are grounds for action in a companion county. Also noted in this section will be the completed case(s) from a reporting county that are sent to another county for action.

B-3 will show those cases where it has been determined that prosecution cannot be undertaken and/or no right to demand repayment exists because of a reporting county error.

B-4 entries will reflect those cases where like conditions exist in the companion county.

B-5 dispositions are those cases where disposition is not possible under another heading because of evidentiary problems.

B-6 will include those cases in which final disposition is made through a restitution arrangement without further referral to the District Attorney for prosecution. It will include dispositions through grant adjustment, agreement to repay, confession of judgment, small claims court, etc.

B-7 will show those cases which have been directed to the District Attorney requesting his consideration for the issuance of a criminal complaint.

B-8 is the total of B-1 through B-7. Section C is computed by subtracting the number reflected in B-8 from the number reflected in A-1.

Section D is reserved for those cases where investigation has developed sufficient evidence to request DA consideration of disposition. It is not to be used to reflect investigative activities of DA investigators or DA SIU's.

D-1 enter here the number of cases pending on the first of the reporting month. On the first report this will be a "zero" entry. On subsequent reports, the entry will be taken from Section E of the previous month's report, or if there is a difference, the discrepancy will be explained in the "Remarks" section.

D-2 enter here the number of cases referred from the investigative unit for action.

D-3, 4 and 5 are self explanatory.

D-6 enter here only those cases finally declined for prosecution and on which no other action will be taken. A preliminary decision not to prosecute pending further investigation is not a declination. Such cases will be carried as pending in the DA's office until the further investigation is completed and a disposition accomplished. At that time they will be entered under the appropriate disposition sections. If the DA declines to prosecute a case and the investigating unit has included a valid and acceptable restitution arrangement in its investigative report, the case will not be noted as disposed of through declination to prosecute, but as an approved restitution arrangement under D-7.

D-7 entries will consist of those appropriate cases as noted in D-6 instructions plus restitution arrangements made by the DA's office (Not DA SIU's) and accepted by him as the final disposition of the case.

D-8 is the total of D-4 through D-7 Section E - Entry will be reckoned by subtracting the D-8 from total of D-1 + D-2.

#### Section F - Fiscal

F-1 gives the total dollar amount of overpayment represented by the cases reported closed in sections B-1 through B-7.

F-2a enter here the total dollar amount of grant adjustments ordered (planned). For instance if a one hundred fifty dollar total overpayment will be settled by a planned grant adjustment of \$150 the whole \$150 should be entered here. On the other hand, if the total overpayment is \$450 and only \$150 can be recovered through grant adjustment, the entry would be \$150.

F-2b enter here all restitution ordered through repayment agreements, promissory notes, confession of judgment and small claims actions. Note: If an overpayment is to be recovered through a combination of grant adjustment and one of the other methods described above, enter only that amount in excess of the planned adjustment.

F-2c is self explanatory

F-2d entries will represent immediate cash restitution obtained.

F-2e is the total of F-2a through F-2d.

F-3 will represent the total dollar amount of all restitution collected during the reporting month which is as a result of cases reported on in this report.

## A. INVESTIGATIVE ACTIVITY

1. On hand 1st of month

## B. DISPOSITIONS

1. No duplicate aid
2. Sent to other county as lead county
3. County error
4. Other county error
5. Insufficient evidence
6. Restitution arranged
7. Referred for criminal complaint
8. Total dispositions

## C. PENDING INVESTIGATIONS AT END OF MONTH

## D. DISTRICT ATTORNEY ACTIVITY

1. On hand 1st of month
2. Criminal complaints requested

## TOTAL

3. Criminal complaints issued

## DISPOSITIONS

4. Convictions
5. Dismissals or acquittals
6. Declinations
7. Restitution arranged
8. Total dispositions

## E. PENDING DA ACTIONS AT END OF MONTH

## F. FISCAL

1. Overpayments determined by investigation
2. Restitution ordered
  - a. Through grant adjustment
  - b. Civil action or agreement to repay
  - c. Through criminal court order
  - d. Voluntary repayment
  - e. Total restitution ordered
3. Recoveries

## G. REMARKS

NUMBER

DOLLARS